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† Also Admitted in District of Columbia

**Via Electronic Case Filing System**

June 11, 2008

United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

**Re: United States of America v. Defendants-In-Rem**  
**Civil Docket No.: 07 Civ. 9577**

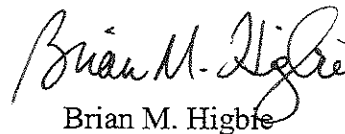
Dear Clerk:

This firm is acting *of counsel* to Perkins & Anctil, P.C., attorneys for Redstone Court Condominium Trust.

Enclosed for filing is Redstone Court Condominium Trust's Verified Claim under Rule G(5) of the Supplemental Rules for Admiralty and Maritime Claims regarding asset forfeiture.

Please call me with any questions.

Sincerely yours,

  
Brian M. Higbie

enclosure

**FILE COPY**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA )

Plaintiff )

v. )

ALL RIGHT, TITLE AND INTEREST IN REAL )  
PROPERTY AND APPURTENANCES LOCATED AT )  
188-1 COLLINS AVENUE, APARTMENT 322-3, )  
SUNNY ISLES BEACH, FLORIDA 33160, AND )

07 Civ. 9577

ALL RIGHT, TITLE AND INTEREST IN REAL )  
PROPERTY AND APPURTENANCES LOCATED AT )  
85 BRAINERD ROAD, TOWNHOUSE 9, BOSTON, )  
MASSACHUSETTS 02134 )

Defendants-In-Rem )

**REDSTONE COURT CONDOMINIUM TRUST'S VERIFIED CLAIM BY AND  
THROUGH ITS AUTHORIZED AGENT RYAN GLEYSTEN UNDER RULE G(5) OF  
THE SUPPLEMENTAL RULES FOR ADMIRALTY OR MARINE AND ASSET  
FORFEITURE CLAIMS**

1. Redstone Court Condominium Trust is a Condominium Trust created by Declaration of Trust recorded with the Suffolk (Massachusetts) Registry of Deeds. Said Condominium Trust is the Unit Owners Association organized pursuant to the provisions of Massachusetts General Laws, Chapter 183A. The Redstone Court Condominium is a residential condominium located in Allston, Suffolk County, Massachusetts. Said Condominium was created by Master Deed dated September 30, 1986, and recorded with the Suffolk (Massachusetts) Registry of Deeds in Book 12920, Page 120. The mailing address of the Condominium Trust is c/o The Albert Corp., 10 Harvard Square #2, Brookline, MA 02146.

2. Maria N. Caicedo (hereinafter "Defendant") is the owner of Unit 9 in the

Redstone Court Condominiums acquired by Deed duly executed, sealed, acknowledged, and delivered dated June 21, 2002 and recorded in the Suffolk Registry of Deeds in Book 28768, Page 291. Ownership of Unit 9 also includes ownership of an undivided 0.01485 percentage interest in the common areas and facilities as defined and described in the Master Deed.

3. I am the Property Manager of the Redstone Court Condominium located in Allston, Suffolk County, Massachusetts. I am employed by The Albert Corp. which has a principal place of business in Brookline, Massachusetts.

4. One of my duties include the collection of all incoming funds for all assessments of unit owners of condominiums located at the Redstone Court Condominium.

5. The Albert Corp. sets up ledger sheets for the Redstone Court Condominium Trust. These ledger sheets set forth all obligations of unit owners at the Redstone Court Condominium, including late fees.

6. Massachusetts General Laws, Chapter 183A, Section 6(a) gives the Redstone Court Condominium Trust the authority to assess against all units in accordance with their respective percentages of undivided interest in the common area and facilities. The statute also gives the Redstone Court Condominium Trust a lien against a unit from the time when the assessment becomes due.

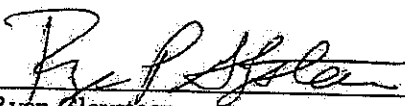
7. Redstone Court Condominium Trust filed suit pursuant to Massachusetts General Laws, Chapter 183A, Section 6, and Chapter 254, Sections 5 and 5A to perfect its lien and

establish priority over other lien holders for the unpaid common area assessments. *Redstone Court Condominium Trust v. Maria N. Caicedo*, Suffolk Superior Court Civil Action No. 07-3077-F; *Redstone Court Condominium Trust v. Maria N. Caicedo*, Suffolk Superior Court Civil Action No. 08-690-C. M. G. L. c. 183A §6 also gives priority over other liens the legal and other costs associated with the collection of the unpaid common area assessments.

8. I have attached a true and attested copy of the ledger sheet for the Maria N. Caicedo.

9. The amount of Twenty Seven Thousand Three Hundred Ninety Four and 56/100 (\$27,394.56) Dollars is due and owing through April 30, 2008, on the condominium known as unit 9 at the Redstone Court Condominium owned by the Defendant. This amount includes common area charges, interest, late fees, as well as reasonable attorney's fees and out-of-pocket expenses through April 30, 2008.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 30<sup>TH</sup> DAY OF APRIL 2008.

  
Ryan Gleysteen

WITNESS my hand and seal this 30<sup>th</sup> day of April 2008.

[Signature]  
Witness

[Signature]  
Ryan Gleysteen

COMMONWEALTH OF MASSACHUSETTS

Suffolk ss.

April 30, 2008

On this 30 day of April 2008, before me, the undersigned notary public, personally appeared Ryan Gleysteen, proved to me through satisfactory evidence of identification, which was personal knowledge of identity to be the person whose name is signed on the preceding or attached document and acknowledged to me that he signed it voluntarily for its stated purpose as Property Manager of the Redstone Court Condominium and not individually.

[Signature]  
Notary public:  
My commission expires: 8/29/2014

APR-30-2008 14:33

THE ALBERT CORP

2775079

P.01/03

T/R 4.3.1

RESTRICTED TRANSACTION HISTORY FOR ALL TRANSACTIONS

AS OF 30 Apr 2008

PAGE 1

CLIENT #: 85 RedStone Court Condo Assoc. PHYS. ADDR: 1085 Commonwealth Ave. #254 MOVIN DATE: 01 Nov 2001  
 UNIT #--: TH9 M. Caicedo Boston, MA 02215 % INTEREST: 1.485000  
 MAILING ADDRESS: c/o Beatriz Ranteria LGL DESC: HOME#: (617)734-2127  
 1085 Commonwealth Ave. #254 MORTGAGER: WORK#: BOSTON, MA 02215 SERVICER:-

CURR BALANCE: 27,394.56 PMTS on HOLD: 0.00 PRIMARY CHRG: 447.45 FEE CHARGE: 0.00  
 UnDEP'd PMTS: 0.00 MISC CHRG: 0.00 DEP CHARGE: 0.00

..DATE..	REF NO.	LAST NAME	SOURCE	AMOUNT	PREV BAL	CURR BAL
04-01-03	41	Caicedo	ASSOCIATION DUES	354.00	0.00	354.00
04-15-03	42	Caicedo	PAYMENT, CK# 133	354.00CR	354.00	0.00
05-01-03	43	Caicedo	ASSOCIATION DUES	354.00	0.00	354.00
05-15-03	44	Caicedo	PAYMENT, CK# 138	708.00CR	354.00	<354.00>
06-01-03	45	Caicedo	ASSOCIATION DUES	354.00	<354.00>	0.00
06-10-03	46	Caicedo	PAYMENT, CK# 143	1,062.00CR	0.00	<1,062.00>
07-01-03	47	Caicedo	ASSOCIATION DUES	354.00	<1,062.00>	<708.00>
08-01-03	48	Caicedo	ASSOCIATION DUES	354.00	<708.00>	<354.00>
09-01-03	49	Caicedo	ASSOCIATION DUES	447.45	<354.00>	93.45
09-01-03	50	Caicedo	SPECIAL ASSESSMENT	1,237.50	93.45	1,330.95
10-01-03	51	Caicedo	ASSOCIATION DUES	447.45	1,330.95	1,778.40
10-01-03	52	Caicedo	SPECIAL ASSESSMENT	1,237.50	1,778.40	3,015.90
10-20-03	53	Caicedo	PAYMENT, CK# 149	1,330.95CR	3,015.90	1,684.95
11-01-03	54	Caicedo	ASSOCIATION DUES	447.45	1,684.95	2,132.40
11-01-03	55	Caicedo	SPECIAL ASSESSMENT	1,237.50	2,132.40	3,369.90
11-17-03	56	Caicedo	DELINQUENT CHARGE	25.00	3,369.90	3,394.90
12-01-03	57	Caicedo	ASSOCIATION DUES	447.45	3,394.90	3,842.35
12-15-03	58	Caicedo	PAYMENT, RMP CK# 154	3,842.35CR	3,842.35	0.00
01-01-04	59	Caicedo	ASSOCIATION DUES	447.45	0.00	447.45
01-20-04	60	Caicedo	DELINQUENT CHARGE	25.00	447.45	472.45
02-01-04	61	Caicedo	ASSOCIATION DUES	447.45	472.45	919.90
02-18-04	62	Caicedo	DELINQUENT CHARGE	25.00	919.90	944.90
03-01-04	63	Caicedo	ASSOCIATION DUES	447.45	944.90	1,392.35
03-16-04	64	Caicedo	DELINQUENT CHARGE	25.00	1,392.35	1,417.35
04-01-04	65	Caicedo	ASSOCIATION DUES	447.45	1,417.35	1,864.80
04-16-04	66	Caicedo	DELINQUENT CHARGE	25.00	1,864.80	1,889.80
04-27-04	67	Caicedo	Perkins#69315, 14-day ltr	75.00	1,889.80	1,964.80
05-01-04	68	Caicedo	ASSOCIATION DUES	447.45	1,964.80	2,412.25
05-10-04	69	Caicedo	Perkins#69436, default ltr prep.	475.00	2,412.25	2,887.25
05-18-04	70	Caicedo	DELINQUENT CHARGE	25.00	2,887.25	2,912.25
06-01-04	71	Caicedo	ASSOCIATION DUES	447.45	2,912.25	3,359.70
06-01-04	72	Caicedo	Perk#69565, constable service	32.00	3,359.70	3,391.70
06-16-04	73	Caicedo	Perkins#69656, title exam review-search	90.00	3,391.70	3,481.70
07-01-04	74	Caicedo	ASSOCIATION DUES	447.45	3,481.70	3,929.15
07-06-04	75	Caicedo	Perkins#69897, prep. of agmt w/ bank	75.00	3,929.15	4,004.15
07-12-04	76	Caicedo	PAYMENT, CK# 053245	4,004.15CR	4,004.15	0.00
08-01-04	77	Caicedo	ASSOCIATION DUES	447.45	0.00	447.45
08-17-04	78	Caicedo	DELINQUENT CHARGE	25.00	447.45	472.45
09-01-04	79	Caicedo	ASSOCIATION DUES	447.45	472.45	919.90
09-16-04	80	Caicedo	DELINQUENT CHARGE	25.00	919.90	944.90
10-01-04	81	Caicedo	ASSOCIATION DUES	447.45	944.90	1,392.35
11-01-04	82	Caicedo	ASSOCIATION DUES	447.45	1,392.35	1,839.80
11-01-04	83	Caicedo	SPECIAL ASSESSMENT	732.60	1,839.80	2,572.40
11-09-04	84	Caicedo	PAYMENT, CK# 176	1,572.00CR	2,572.40	1,000.40
12-01-04	85	c/o Beatriz Ranteria	ASSOCIATION DUES	447.45	1,000.40	1,447.85
12-01-04	86	c/o Beatriz Ranteria	SPECIAL ASSESSMENT	732.60	1,447.85	2,180.45
12-16-04	87	c/o Beatriz Ranteria	DELINQUENT CHARGE	25.00	2,180.45	2,205.45

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THE ALBERT CORP

2775079

P.02/03

T/R 4.3.1

## RESTRICTED TRANSACTION HISTORY FOR ALL TRANSACTIONS

AS OF 30 Apr 2008

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T/R	4.3.1	RESTRICTED TRANSACTION HISTORY FOR ALL TRANSACTIONS	AS OF 30 Apr 2008	PAGE 2
12-17-04	88	c/o Beatriz Ranteria PAYMENT, RMP CR# 179	4,000.00CR 2,205.45 <1,794.55>	
01-01-05	89	c/o Beatriz Ranteria ASSOCIATION DUES	447.45 <1,794.55> <1,347.10>	
01-01-05	90	c/o Beatriz Ranteria SPECIAL ASSESSMENT	732.60 <1,347.10> <614.50>	
02-01-05	91	c/o Beatriz Ranteria ASSOCIATION DUES	447.45 <614.50> <167.05>	
02-11-05	92	c/o Beatriz Ranteria PAYMENT, RMP CR# 182	167.05CR <167.05> <334.10>	
03-01-05	93	c/o Beatriz Ranteria ASSOCIATION DUES	447.45 <334.10> 113.35	
04-01-05	94	c/o Beatriz Ranteria ASSOCIATION DUES	447.45 113.35 560.80	
04-20-05	95	c/o Beatriz Ranteria DELINQUENT CHARGE	25.00 560.80 505.80	
05-01-05	96	c/o Beatriz Ranteria ASSOCIATION DUES	447.45 585.80 1,033.25	
05-17-05	97	c/o Beatriz Ranteria DELINQUENT CHARGE	25.00 1,033.25 1,058.25	
06-01-05	98	c/o Beatriz Ranteria ASSOCIATION DUES	447.45 1,058.25 1,505.70	
06-20-05	99	c/o Beatriz Ranteria DELINQUENT CHARGE	25.00 1,505.70 1,530.70	
07-01-05	100	c/o Beatriz Ranteria ASSOCIATION DUES	447.45 1,530.70 1,978.15	
07-18-05	101	c/o Beatriz Ranteria Delinquent Charge	25.00 1,978.15 2,003.15	
08-01-05	102	c/o Beatriz Ranteria ASSOCIATION DUES	447.45 2,003.15 2,450.60	
08-16-05	103	c/o Beatriz Ranteria DELINQUENT CHARGE	25.00 2,450.60 2,475.60	
08-15-05	104	c/o Beatriz Ranteria Perkins#76573: 14day collection letter	75.00 2,475.60 2,550.60	
09-01-05	105	c/o Beatriz Ranteria ASSOCIATION DUES	447.45 2,550.60 2,998.05	
08-29-05	106	c/o Beatriz Ranteria Perkins#76811, title exam,default ltr,certif.	554.42 2,998.05 3,552.47	
09-16-05	107	c/o Beatriz Ranteria DELINQUENT CHARGE	25.00 3,552.47 3,577.47	
09-16-05	108	c/o Beatriz Ranteria Perkins#77276, title exam review	57.00 3,577.47 3,634.47	
10-01-05	109	c/o Beatriz Ranteria ASSOCIATION DUES	447.45 3,634.47 4,081.92	
10-18-05	110	c/o Beatriz Ranteria DELINQUENT CHARGE	25.00 4,081.92 4,106.92	
10-18-05	111	c/o Beatriz Ranteria Perkins#77648: title exam	25.00 4,106.92 4,131.92	
11-01-05	112	c/o Beatriz Ranteria ASSOCIATION DUES	447.45 4,131.92 4,579.37	
11-17-05	113	c/o Beatriz Ranteria DELINQUENT CHARGE	25.00 4,579.37 4,604.37	
12-01-05	114	c/o Beatriz Ranteria ASSOCIATION DUES	447.45 4,604.37 5,051.82	
12-16-05	115	c/o Beatriz Ranteria DELINQUENT CHARGE	25.00 5,051.82 5,076.82	
01-01-06	116	c/o Beatriz Ranteria ASSOCIATION DUES	447.45 5,076.82 5,524.27	
01-18-06	117	c/o Beatriz Ranteria DELINQUENT CHARGE	25.00 5,524.27 5,549.27	
02-01-06	118	c/o Beatriz Ranteria ASSOCIATION DUES	447.45 5,549.27 5,996.72	
02-16-06	119	c/o Beatriz Ranteria DELINQUENT CHARGE	25.00 5,996.72 6,021.72	
03-01-06	120	c/o Beatriz Ranteria ASSOCIATION DUES	447.45 6,021.72 6,469.17	
03-16-06	121	Caicedo DELINQUENT CHARGE	25.00 6,469.17 6,494.17	
04-01-06	122	Caicedo ASSOCIATION DUES	447.45 6,494.17 6,941.62	
04-19-06	123	Caicedo DELINQUENT CHARGE	25.00 6,941.62 6,966.62	
05-01-06	124	Caicedo ASSOCIATION DUES	447.45 6,966.62 7,414.07	
05-18-06	125	Caicedo DELINQUENT CHARGE	25.00 7,414.07 7,439.07	
06-01-06	126	Caicedo ASSOCIATION DUES	447.45 7,439.07 7,886.52	
06-15-06	127	Caicedo Perking #81991: 14 day collection letter	75.00 7,886.52 7,961.52	
06-16-06	128	Caicedo DELINQUENT CHARGE	25.00 7,961.52 7,986.52	
07-01-06	129	Caicedo ASSOCIATION DUES	447.45 7,986.52 8,433.97	
07-18-06	130	Caicedo DELINQUENT CHARGE	25.00 8,433.97 8,458.97	
08-01-06	131	Caicedo ASSOCIATION DUES	447.45 8,458.97 8,905.42	
08-17-06	132	Caicedo DELINQUENT CHARGE	25.00 8,905.42 8,931.42	
09-01-06	133	Caicedo ASSOCIATION DUES	447.45 8,931.42 9,378.87	
09-18-06	134	Caicedo DELINQUENT CHARGE	25.00 9,378.87 9,403.87	
10-01-06	135	Caicedo ASSOCIATION DUES	447.45 9,403.87 9,851.32	
10-17-06	136	Caicedo DELINQUENT CHARGE	25.00 9,851.32 9,876.32	
11-01-06	137	Caicedo ASSOCIATION DUES	447.45 9,876.32 10,323.77	
11-16-06	138	Caicedo DELINQUENT CHARGE	25.00 10,323.77 10,348.77	
12-01-06	139	Caicedo ASSOCIATION DUES	447.45 10,348.77 10,796.22	
12-01-06	140	Caicedo th9Perkins#86506: default ltr/atc collection	589.88 10,796.22 11,386.10	
12-18-06	141	Caicedo DELINQUENT CHARGE	25.00 11,386.10 11,411.10	
12-14-06	142	Caicedo Perkins#87235: Title Exam Deed	109.76 11,411.10 11,520.86	
01-01-07	143	Caicedo ASSOCIATION DUES	447.45 11,520.86 11,968.31	
12-29-06	144	Caicedo Perkins#87754: constable fees	66.00 11,968.31 12,034.31	

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THE ALBERT CORP

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T/R 4.3.1

## RESTRICTED TRANSACTION HISTORY FOR ALL TRANSACTIONS

AS OF 30 Apr 2008

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T/R	DATE	AMOUNT	DESCRIPTION	BALANCE	CUMULATIVE BALANCE
01-17-07	145		Caicedo		
			DELINQUENT CHARGE	25.00	12,034.31
02-01-07	146		Caicedo		
			ASSOCIATION DUES	447.45	12,059.31
02-16-07	147		Caicedo		
			DELINQUENT CHARGE	25.00	12,506.75
01-16-07	148		Caicedo		
			Perkins - adj. billing	100.00	12,531.75
01-16-07	149		Caicedo		
			th9Perkins#88015: title exam	25.00	12,431.75
03-01-07	150		Caicedo		
			ASSOCIATION DUES	447.45	12,456.76
03-21-07	151		Caicedo		
			DELINQUENT CHARGE	25.00	12,904.21
04-01-07	152		Caicedo		
			ASSOCIATION DUES	447.45	12,929.21
04-17-07	153		Caicedo		
			DELINQUENT CHARGE	25.00	13,376.66
05-01-07	154		Caicedo		
			ASSOCIATION DUES	447.45	13,401.66
05-01-07	155		Caicedo		
			AMENDMENT: SUPPL. BUDGET	594.00	13,849.11
05-01-07	156		Caicedo		
			TH9 Perkins #89885: title exam	25.00	14,443.11
05-16-07	157		Caicedo		
			DELINQUENT CHARGE	25.00	14,468.11
06-01-07	158		Caicedo		
			ASSOCIATION DUES	447.45	14,493.11
06-01-07	159		Caicedo		
			AMENDMENT: SUPPL. BUDGET	594.00	14,940.56
05-31-07	160		Caicedo		
			TH9 Perkins#90618: title exam	50.00	15,534.56
06-18-07	161		Caicedo		
			DELINQUENT CHARGE	25.00	15,592.56
06-15-07	162		Caicedo		
			TH9 Perkins#90881: Consbl. fee/cert. copy/summon	398.00	15,617.56
07-01-07	163		Caicedo		
			ASSOCIATION DUES	447.45	16,015.56
07-01-07	164		Caicedo		
			AMENDMENT: SUPPL. BUDGET	594.00	16,463.01
07-17-07	165		Caicedo		
			DELINQUENT CHARGE	25.00	17,057.01
07-27-07	166		Caicedo		
			#TH9 Perkins#91819: Review title/draft complain	1,500.00	17,082.01
08-01-07	167		Caicedo		
			ASSOCIATION DUES	447.45	18,582.01
08-01-07	168		Caicedo		
			AMENDMENT: SUPPL. BUDGET	594.00	19,029.46
08-01-07	169		Caicedo		
			#TH9 Perkins#92438: Registry record, FedEx chrg	110.00	19,623.46
08-16-07	170		Caicedo		
			DELINQUENT CHARGE	25.00	19,733.46
09-01-07	171		Caicedo		
			ASSOCIATION DUES	447.45	19,758.46
09-01-07	172		Caicedo		
			AMENDMENT: SUPPL. BUDGET	594.00	20,205.91
09-18-07	173		Caicedo		
			DELINQUENT CHARGE	25.00	20,799.91
10-01-07	174		Caicedo		
			ASSOCIATION DUES	447.45	20,824.91
10-01-07	175		Caicedo		
			AMENDMENT: SUPPL. BUDGET	594.00	21,272.36
10-16-07	176		Caicedo		
			DELINQUENT CHARGE	25.00	21,866.36
11-01-07	177		Caicedo		
			ASSOCIATION DUES	447.45	21,891.36
11-16-07	178		Caicedo		
			DELINQUENT CHARGE	25.00	22,338.81
12-01-07	179		Caicedo		
			ASSOCIATION DUES	447.45	22,363.81
11-30-07	180		Caicedo		
			#TH9 Perkins#94150: Default letter prep/fee	510.00	22,811.26
12-17-07	181		Caicedo		
			#TH9 Perkins#94450: Constable service fee	33.00	23,321.26
01-01-08	182		Caicedo		
			ASSOCIATION DUES	447.45	23,354.26
01-16-08	183		Caicedo		
			DELINQUENT CHARGE	25.00	23,801.71
02-01-08	184		Caicedo		
			ASSOCIATION DUES	447.45	23,826.71
01-31-08	185		Caicedo		
			#TH9 Perkins#96409: Title exam/record fee	1,372.50	24,274.16
02-19-08	186		Caicedo		
			DELINQUENT CHARGE	25.00	25,646.66
03-01-08	187		Caicedo		
			ASSOCIATION DUES	447.45	25,671.66
02-29-08	188		Caicedo		
			#TH9 Perkins#96865: Sheriff's/recording fee	125.00	26,119.11
03-18-08	189		Caicedo		
			DELINQUENT CHARGE	25.00	26,244.11
04-01-08	190		Caicedo		
			ASSOCIATION DUES	447.45	26,269.11
03-31-08	191		Caicedo		
			#TH9 Perkins#97352: Legal notice published	378.00	26,716.56
04-17-08	192		Caicedo		
			DELINQUENT CHARGE	25.00	27,094.56
04-16-08	193		Caicedo		
			#TH9 Perkins#97734: Title update review	275.00	27,119.56